

Central Valley Regional Water Quality Control Board

27 November 2018

Mr. Parry Klassen
Executive Officer
East San Joaquin Water Quality Coalition
1201 L Street
Modesto, CA 95354

Dr. Michael Johnson
Technical Program Director
East San Joaquin Water Quality Coalition
1480 Drew Ave. Suite #130
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APPROVAL TO EXCHANGE THE ZONE 2 CORE SITE, PRAIRIE FLOWER DRAIN @ CROWS LANDING RD, WITH WESTPORT DRAIN @ VIVIAN RD

Thank you for submitting the 19 July 2018 request to update the East San Joaquin Water Quality Coalition (Coalition) Monitoring and Reporting Program. The request proposes to exchange the Zone 2 rotating Core site, Prairie Flower Drain @ Crows Landing Rd, with Westport Drain @ Vivian Rd, and monitor Prairie Flower Drain @ Crows Landing Rd as a Represented site in Zone 2.

Staff concurs with the Coalition's rationale to exchange the Core site location. The Westport Drain @ Vivian Rd site subwatershed encompasses a wide variety of crops that is more representative of other drains in Zone 2. In addition, the Westport Drain site subwatershed contains a greater percentage of member acreage than the Prairie Flower Drain site subwatershed. Accordingly, the impact from irrigated agriculture can be better assessed by exchanging the rotating Zone 2 Core site from Prairie Flower Drain to Westport Drain.

Based on the rationale provided in the request letter, and staff's review, I approve the Coalition's request to designate Westport Drain @ Vivian Rd as a rotating Zone 2 Core site and Prairie Flower Drain @ Crows Landing Rd as a Represented site.

If you have questions regarding this letter, please contact Yared Kebede by e-mail at (916) 464-4828 or by email at Yared.Kebede@waterboards.ca.gov.

Sincerely,

Original signed by

Patrick Pulupa
Executive Officer

Enclosure: Staff Review of the East San Joaquin Water Quality Coalition Request to Exchange the Zone 2 Core Site

Central Valley Regional Water Quality Control Board

TO: Susan Fregien
Senior Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

FROM: Yared Kebede
Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

DATE: 21 November 2018

SUBJECT: ZONE 2 CORE SITE EXCHANGE REVIEW – EAST SAN JOAQUIN WATER
QUALITY COALITION

On 19 July 2018, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) received the East San Joaquin Water Quality Coalition (Coalition) request to modify its Monitoring and Reporting Program (MRP). The Coalition specifically requested to exchange the Zone 2 rotating Core site, Prairie Flower Drain @ Crows Landing Rd, with Westport Drain @ Vivian Rd, and monitor Prairie Flower Drain @ Crows Landing Rd as a Represented site beginning in October 2018.

Staff evaluated the Coalition's rationale for the core site exchange and agrees that the types and proportion of crops in the Westport Drain @ Vivian Rd watershed area are more representative of Zone 2 and it will better serve as a Core site than Prairie Flower Drain. Additionally, the Westport Drain area has a higher proportion of member acreage. Staff recommends approval of the Zone 2 core site exchange request. Detailed land use and member acreage information is provided below.

Land Use Data

The land use (i.e., crop composition) in the Westport Drain is more representative of irrigated agriculture in Zone 2 than Prairie Flower Drain, which is dominated by field crops, pasture, and dairy/feedlots (Table 1). The land use in the Westport Drain is also similar with the second rotating Core site - Lateral 5½ @ South Blaker Rd (48% deciduous nuts, 30% field crops, 17% pasture, 2% berries, 2% vineyards), and rotating the assessment monitoring between the Westport Drain and Lateral 5½ sites can adequately characterize discharges from irrigated agriculture.

Table 1. Land use comparisons for Zone 2, Prairie Flower Drain @ Crows Landing Rd, and Westport Drain @ Vivian Rd.

Crops	Zone 2		Prairie Flower Drain		Westport Drain	
	Acreage	Crop%	Acreage	Crop%	Acreage	Crop%
Deciduous Fruits and Nuts	57,190	29%	-	-	531	30%
Field Crops	49,286	25%	1,865	60%	398	23%
Dairy and Feedlot	40,579	21%	638	20%	299	17%
Urban	20,446	10%	-	-	-	-
Pasture	16,977	9%	451	14%	357	20%
Idle	3,393	2%	22	1%	-	-
Truck, Nursery and Berry Crops	3,222	2%	108	3%	-	-
Citrus and Subtropical	147	1%	-	-	-	-
Riparian Vegetation	420	1%	30	1%	-	-
Young Perennial	179	1%	-	-	-	-
Grain and Hay Crops	2,057	1%	13	<1%	-	-
Vineyards	1,885	1%	-	-	160	9%
Total Acreage	195,781		3,126		1,745	
Total Member Acreage			730		630	
Percentage Member Acreage			23%		36%	

Member Acreage (%)

The total member acreage in the Westport Drain (630 acres) subwatershed is smaller than Prairie Flower Drain (730 acres). However, the Westport Drain subwatershed contains a higher proportion of member acreage (36%) than Prairie Flower Drain (23%). In addition, the predominance of fruits and nuts in the subwatershed (531 acres), or lack thereof in the Prairie Flower Drain subwatershed, supports the representativeness of Westport Drain for Zone 2 sites.

Prairie Flower Drain Water Quality Concerns

The Coalition first began monitoring at Prairie Flower Drain in 2005. Numerous exceedances of water quality criteria have been observed during its monitoring history. The site is currently under management plans for several constituents including *Selenastrum capricornutum*, *Ceriodaphnia dubia*, chlorpyrifos, molybdenum, *E. coli*, nitrate, ammonia, specific conductivity, pH and dissolved oxygen. The change of Prairie Flower Drain to a represented site does not change the status or requirements of the management plans. The Coalition must continue to implement the activities and monitoring required by the approved management plans.

However, Central Valley Water Board staff recognizes that Prairie Flower Drain presents unique challenges regarding identification of the sources of water quality problems and implementation of practices to resolve those problems. Staff is currently developing a plan to evaluate all land use activities in the watershed, identify all potential sources of discharge, and require all potential dischargers to take the necessary actions to prevent discharges of contaminants. Staff expects the Coalition and members to participate in any applicable actions.